

United States District Court  
For The  
District Court of Oregon

RE: Case 3:24-CV-575-JR  
Plaintiff: Mervin W January  
Defendant: Sarita J Hill

In answer/response to the Summons in Civil Action received 07/29/2024.

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**The statements and claims made in the complete document including all exhibits are false.** I, Sarita J Hill did not hire a private investigator to contact, harass or follow Mervin W. January or his wife Monique January. I did not contact his or her employer or church, friends, family or anyone else regarding Mervin W. January. I did not participate in the creation of any social media page or comment on any social media page or website including Facebook or Google.

I did not create any of the information in Exhibits 1-4 referring to the Deadbeat Dad Posts. I had nothing to do with contacting any employers, companies or place of work as reflected in the following exhibits 3a-12.

I did not send the emails calling Mervin a deadbeat father or creation of any documents shown in exhibits 13-29a.

The information in exhibit 30 is not true. I Sarita J Hill, never told Monique January any statement that said it was my fault. Monique January did disclose that Mervin January did not sleep at night and he was tormented for what he had done with his children. The letter is a lie about the relationship between Mervin January and I. We spent time together, we went to a movie, I kept his daughter for him, he came to my church. When we found out I was pregnant, we met with my pastor because Mervin wanted me to have an abortion. When I disagreed, he turned mean and verbally abusive.

When Mervin visited our son Jonathan Hill in Arizona, I allowed him to spend time with him without hesitation or any stipulation. During this visit Mervin was not pleasant towards Jonathan, also making statements to me that something was wrong with Jonathan mentally and physically because Jonathan did not live up to the expectation Mervin had. I allowed his wife Monique to also spend time with Jonathan. I even offered to bring Jonathan to Portland to visit. I tried to maintain contact with Mervin and Monique to keep them updated on Jonathan and Mervin cut off the communication stating not to contact him or his wife.

In 2019, I contacted Mervin to notify him that Jonathan attempted to commit suicide. Mervin did not come to see Jonathan or call to check on him while he was in the hospital. Mervin made no efforts to contribute to the well being of his son.

Mervin has continued to be in contempt of the of the child support orders in place.

**8+** I am notifying all parties at this time that I am filing a countersuit for \$270,000 for defamation of character, unpaid child support, unpaid attorney fees, all current and future fees and expenses, all current and future attorney fees, harassment, and continued emotional and mental stress and to cover educational and living expenses for Jonathan Hill. The amount to be paid by Mervin W January of \$270,000 to be paid to Sarita J Hill.

This letter will be delivered to Mervin W January at the address provided in the summons delivered as well as to the District court of Oregon.

Sarita Hill

*Sarita Hill*  
8/15/24

Contact - 470-251-7613  
Sarita Hill  
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